

Holy Mission of Guru Nanak

Privacy Policy

We would like our service users to understand how any personal information shared with us will be used ('personal information' means information that identifies our could identify you). Here, we explain how we collect, use and store your personal information.

This Privacy Policy may change so please remember to check back from time to time. This is version was last updated on 25/05/2019. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

1. Who we are

We are 'Holy Mission of Guru Nanak' (also popularly known as 'Sindhi Mandir'), a charity based in London, UK (Charity Registration Number: 1151738; Company Number: 08026761). We are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We can be contacted in the following ways:

- By writing to us at Holy Mission of Guru Nanak, Sindhi Community House, 318 Cricklewood Broadway, London, NW2 6QD.
- By email, to emailadmin@sindhimandir.org
- By telephone, on 0208 450 1341

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

We want to make sure that you receive communications that are most relevant to you and in ways that you prefer.

2. How we collect information about you

We collect information from you in the following ways:

- When you interact with us directly: This could be if you ask us about our activities, register with us for an event, make a donation to us, ask a question about our services, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This may be when you contact us by telephone, email,

social media, post, visit our website, complete and return any of our electronic or paper forms, or speak to us in person.

- Sometimes this involves contacting us through third parties that we work with and provide your consent for your personal information to be shared with us. For example, when you provide a donation through our bank accounts or through PayPal.
- Wherever possible we use anonymous information which does not identify individual visitors to our website. However, we may also gather general (not personal) information when you visit our website, which might include which pages you visit most often and which services, events or information is of most interest to you.
- When you visit our premises at Sindhi Community House, for your safety and security CCTV video material of locations around the building is recorded and retained for a limited period before being automatically deleted to create space for new recordings. You may appear in any of these video recordings. We do not record audio. We may occasionally take copies of these recordings to investigate particular issues.
- We sometimes send communications to specific individuals about specific events and activities if you have requested that you are included in particular contact lists.
- We may also use “cookies” to help our website run effectively (see below for more details).
- Please contact us if you would like us to amend our records of your personal information, or delete it from our records. We will only retain a record of your request under those circumstances.

3. Information we collect and why we use it

Personal Information

Personal information we collect includes details such as your name, email address, postal address, telephone number, mobile telephone number, and your preference for how we contact you. We will also keep any communications and information in these if necessary. You will have given us this information whilst making a donation or other payment, registering for an event, or any of the other ways to interact with us. CCTV video recordings of visitors are also regarded as personal information.

We will use this information for some or all of the following:

- To inform you about community and news, events and activities that we run.
- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services or goods that you have requested.
- To update you with important administrative messages about your donation, an event or services or goods you have requested.
- To comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the Charity Commission (these may require us to identify and verify the identity of donors who make major gifts).
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.
- To contact you about our work and how you can support us
- To invite you to participate in surveys or research.
- If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide goods and services you have requested.
- To ensure the security of Sindhi Community House and its visitors using CCTV.

Sensitive Personal Information

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, well-being, or religious beliefs amongst other things. If you provide us with such information, for example, about your health and well-being, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.
- Where you have given us your express consent or otherwise clearly indicated to us (for example, by submitting your story through our 'Your Stories' website page) that you are happy for us to share your story, then we may publish it on our blog or in other media.

5. Legal basis for using your information

The legal basis of processing your personal data are set out in GDPR regulations. There are a number of legal bases upon which we can process your personal data. Two are particularly important for us that relate to marketing (see below). First, we can process your personal data using your recorded consent to do so, and this our preferred method. However,

second, existing personal data for which we don't yet have a record of consent may be processed on the basis of 'legitimate interest'. Under these circumstances we ensure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance between these interests. So, personal data that has been in regular use for these purposes will therefore be retained for a limited period up to 25th May 2020. During this period we will ask individuals to provide consent if they would like to continue to stay in touch with us. After this period all data for which no consent is recorded will be discarded. We may also process data on other legal bases (e.g. if you have a contract with us).

6. Sharing your Information

The personal information we collect about you will mainly be used by our staff and volunteers. We will never sell or share your personal information with any third parties unless this data specifically relates to the activities of the charity (for example, processing donation for Gift Aid, or partners such as MailChimp or CharityEmail.com, who help us to manage email).

We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

We may disclose your information if required to do so by law, or in order to protect other people's property, safety or rights. We can exchange information with others to protect against fraud or credit risks.

Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR and the law.

7. Keeping your information safe

We have measures in place to keep your data safe. We've implemented appropriate measures to protect the personal information we have under our control which should minimise the chances of inappropriate access, use, alteration, destruction and loss.

Although we do our best to protect your personal information sent to us electronically (for example online forms and email), we cannot guarantee the security of data transmitted to us.

Our website may contain links to other websites, and although we try to use links only to websites which have high standards for security and privacy, we are not responsible for the content or the privacy practices employed by other sites. This privacy statement does not cover the information practices of those websites or their advertisers.

8. How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

10. Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us either by telephone, post or email (please find our contact information above). You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>. You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.

Right to object: You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.

Consent: If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.

Rectification: You can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure: You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

Portability: You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Restriction: You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

No automated-decision making: Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

11. Cookies

All Cookies used by and on our website are used in accordance with current English and EU Cookie Law. The site uses cookies or similar technology to collect information about your access to the site. Cookies are pieces of information that include a unique reference code that a website transfers to your device to store and sometimes track information about you. A few of the cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the site and will last for longer.

All cookies used on our site are set by us

Most computer and some mobile web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can prevent the setting of cookies by adjusting the settings on your browser. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of the site.

Our cookies will be used for:

Essential session management

creating a specific log-in session for a user of the site in order that the site remembers that a user is logged in and that their page requests are delivered in an effective, secure and consistent manner;

recognising when a user of the site has visited before allowing us to identify the number of unique users we receive to the site and make sure we have enough capacity for the number of users that we get;

recognising if a visitor to the site is registered with us in any way;

we may also log information from your computer including the existence of cookies, your IP address and information about your browser program in order to allow us to diagnose problems, administer and track your usage of our site.

Functionality

customising elements of the promotional layout and/or content of the pages of the site.

Performance and measurement

collecting statistical information about how our users use the site so that we can improve the site and learn which parts are most popular to users.

12. Monitoring

Your communications (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our service standards.